13. (once amended) A system according to Claim 11 further configured to use historical data stored in said customer database to direct a marketing campaign towards a target group flagged by the plurality of models.

14. (once amended) A system according to Claim 11 further configured to combine a plurality of models to determine a depth of a targeted mailing.

15. (once amended) A system according to Claim 11 further configured to combine a plurality of models to determine a likelihood of a customer response.

16. (once amended) A system according to Claim 11 further configured to combine a plurality of models to generate a potential customer list.

17. (once amended) A system according to Claim 11 further configured to combine a plurality of models to determine a risk factor for a target group.

18. (once amended) A system according to Claim 11 further configured to combine a plurality of models to determine expected profitability per customer of a marketing campaign.

19. (once amended) A system according to Claim 11 further configured to combine a plurality of models to determine expected profitability per product of a marketing campaign.

Remarks

The Office Action mailed April 12, 2002 has been carefully reviewed and the foregoing amendment has been made in consequence thereof. Submitted herewith is a Submission of Marked Up Paragraphs and Claims.

Claims 1-11, and 13-21 are pending in this application. Claim 12 has been cancelled. Claims 1-21 stand rejected.

The objection to the specification is respectfully traversed. Specifically, although Applicants respectfully submit that the originally submitted title of the invention clearly

3

describes the claimed invention, in an effort to expedite the prosecution of this application, Applicants have amended the title of the invention. Accordingly, Applicants respectfully request that the objection to the title of the invention be withdrawn.

Applicants also note the objection relating to a typographical error in the specification wherein two punctuation marks follow the word "value" on page 4, line 32 of the present application. Applicants have amended the specification to correct the typographical error. Accordingly, Applicants respectfully request that the objection to the specification of the application be withdrawn.

For at least the reasons set forth above, Applicants respectfully request that the objection to the specification and the title be withdrawn.

The rejection of Claims 14-20 under 35 U.S.C. § 112 is respectfully traversed.

Claims 14-19 have been amended to add the recitation "a plurality of" before the term "models." With respect to Claim 20, Applicants have not amended Claim 20 and respectfully submit that, as originally filed, Claim 20 does not recite the recitation "to combine models." Accordingly, Applicants respectfully submit that Claims 14-20 are definite and distinctly claim the subject matter of the invention.

For at least the reasons set forth above, Applicants respectfully request that the Section 112 rejection of Claims 14-20 be withdrawn.

The rejection of Claims 1-21 under 35 U.S.C. § 102(b) as being anticipated by Jackson et al., Strategic Database Marketing (1996) (referred to herein as "Jackson") is respectfully traversed.

Jackson generally describes a business-based approach to strategic database marketing, wherein historical data collected by a marketer is stored in historical data management databases such that the historical data can be later used by the marketer. (See pages 27-28.) Jackson also

describes a recency, frequency, and monetary (RFM) analysis that allows a marketer to identify a business' "best customers" based upon the frequency and sales dollars that the customers have spent with the business. The RFM data can also be used to create a lifetime value model of customers, which can project the value of a customer over a period of years. (See pages 40-41.) Jackson further describes combining models so that a marketer can determine the most desirable segments upon which to focus the allocation of marketing resources. (See pages 184-185.) The database-driven marketing programs enable a business to target a specific product to the correct consumer in order to make a sale. (See page 39.) To the extent understood, however, Jackson does not describe nor suggest a system or method for defining marketing campaigns that includes using a targeting engine to determine a target group, or models embedded within and executed by a targeting engine to determine a target group.

Claim 1 recites a method for increasing the efficiency of marketing campaigns using a targeting engine for analyzing data input and generating data output wherein the method includes the steps of "using historical data to determine a target group based upon a plurality of models embedded within and executed by the targeting engine wherein the targeting engine combines the models to define the target group ... and directing the marketing campaign towards the target group determined by the models."

Jackson does not describe nor suggest a method that includes the steps of using historical data to determine a target group based upon a plurality of models embedded within and executed by a targeting engine wherein the targeting engine combines the models to define the target group, and directing the marketing campaign towards the target group determined by the models. More specifically, Jackson does not describe nor suggest using a targeting engine for analyzing data input and generating data output, nor does Jackson describe or suggest a method that includes the step of using historical data to determine a target group based upon a plurality of models embedded within and executed by a targeting engine. Furthermore, Jackson does not describe nor suggest a method for increasing the efficiency of marketing campaigns using a targeting engine that combines the models to define the target group.

5

Rather, Jackson describes a business-based approach to strategic database marketing that uses historical data and models to generate data that is then analyzed by a marketer to determine the most desirable segments upon which to focus the allocation of marketing resources. In other words, Jackson generates data that is analyzed by a marketer such that the marketer can determine a target group. For example, Jackson states that a marketing database "allows the marketer to analyze the data for detailed marketing decisions." (See page 28.) Jackson also states that "[w]ith this information [RFM data], a marketer can not only determine which customers have the best potential, but also how much he or she can market to these customers over time and still maximize profits." (See page 41.)

In contrast, the present invention describes using a targeting engine for analyzing data input or generating data output, and using historical data and a plurality of models executed by the targeting engine wherein the targeting engine combines the models to define a target group. It does not appear that Jackson even mentions using a targeting engine for analyzing data input or generating data output, or using models embedded within and executed by a targeting engine to determine a target group. Moreover, Jackson does not describe nor suggest a method for increasing the efficiency of marketing campaigns using a targeting engine that combines the models to define the target group. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Jackson.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 102(b) rejection of Claim 1 be withdrawn.

Claims 2-10 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2-10 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-10 likewise are patentable over Jackson.

Claim 11 recites a system configured to increase efficiency of marketing campaigns that includes "a customer database which includes customer demographics and historical data ...a targeting engine for analyzing data input and generating data output, said targeting engine having

6

a plurality of models stored thereon, said targeting engine uses said historical data and combines said models to determine a target group for marketing ... and a graphical user interface for accessing customer database and displaying data output."

Jackson does not describe nor suggest a system that includes a targeting engine for analyzing data input and generating data output wherein the targeting engine, having a plurality of models stored thereon, uses historical data and combines models to determine a target group for marketing. Rather, in contrast to the present invention, Jackson describes a business-based approach to strategic database marketing that uses historical data and models to generate data that is analyzed by a marketer to determine the most desirable segments upon which to focus the allocation of marketing resources. In other words, the system described in Jackson generates data that is analyzed by a marketer such that the marketer can then determine a target group. Jackson, however, does not describe nor suggest a system that includes a targeting engine for analyzing data input and generating data output wherein the targeting engine, having a plurality of models stored thereon, uses historical data and combines the models to determine a target group for marketing.

Furthermore, Applicants respectfully disagree with the assertion within the Office Action that Jackson teaches a targeting engine as described in the present invention by discussing segmentation as a process of manipulating a database by dividing the database into subsets wherein each subset has a common characteristic; and by discussing the use of program building scoring models to manipulate data in the database. Rather, Applicants respectfully submit that neither the process of segmentation nor the use of program building scoring models describes or suggests a targeting engine for analyzing data input and generating data output wherein the targeting engine uses historical data and combines models to determine a target group for marketing. The mere discussion in Jackson of the segmentation process and the use of program building scoring models does not teach a targeting engine as described in the present invention. Accordingly, Applicants respectfully submit that Claim 11 is patentable over Jackson.
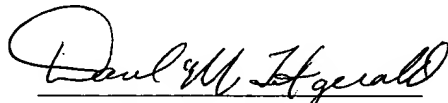
For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 102(b) rejection of Claim 11 be withdrawn.

Claim 12 has been cancelled. Claims 13-21 depend, directly or indirectly, from independent Claim 11. When the recitations of Claims 13-21 are considered in combination with the recitations of Claim 11, Applicants submit that dependent Claims 13-21 likewise are patentable over Jackson.

For at least the reasons set forth above, Applicants respectfully request that the Section 102 rejection of Claims 1-21 be withdrawn.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

Daniel M. Fitzgerald
Registration No. 38,880
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070

Express Mail Label No.: EV130048441US

17207-00004
PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant: Samra et al.

       Art Unit: 2163

Serial No.: 09/474,974

       Examiner: Beth Van Doren

Filed: December 29, 1999

For: METHODS AND SYSTEMS
        FOR TARGETING MARKETS

SUBMISSION OF MARKED UP PARAGRAPHS AND CLAIMS

Hon. Commissioner for Patents
Washington, D.C. 20231

Submitted herewith are Marked Up Paragraphs and Claims in accordance with 37 C.F.R. 1.121(b)(1)(ii) and 1.121(c)(1)(ii).

IN THE SPECIFICATION

Please delete the title and replace with the following title:

METHODS AND SYSTEMS FOR DEFINING TARGETED MARKETING CAMPAIGNS USING EMBEDDED MODELS AND HISTORICAL DATA

Please replace the paragraph beginning on page 4, line 21, and ending on page 4, line 34, with the following replacement paragraph.

However a cash loan or home equity loan may still be of interest to the automobile loan purchaser. In deciding whether to market to him or her, other criteria that has been entered into the targeting engine 22 database in the form of a transaction database can be examined. The transaction database contains database elements for tracking performance of previously purchased products, in this case the automobile loan. Information tracked contains, for example, how often payments have been made, how much was paid, in total and at each payment, any

1

arrears, and the percentage of the loan paid. Again the list is illustrative only. Using information of this type, targeting engine 22 can generate a profitability analysis by combining models to determine a probability score for response, attrition and risk. Customers are rank ordered by probability of cross-sell response, attrition, risk, and net present value.[.] For example, if a consumer pays a loan off within a short time, that loan product was not very profitable. The same can be said of a product that is constantly in arrears. The effort expended in collection efforts tends to reduce profitability.

IN THE CLAIMS

Please cancel Claim 12.

1. (once amended) A method for increasing the efficiency of marketing campaigns using a targeting engine for analyzing data input and generating data output, said method including the steps of:

using historical data to determine a target group based upon a plurality of [embedded] models embedded within and executed by the targeting engine wherein the targeting engine combines the models to define the target group; and

directing the marketing campaign towards the target group [flagged] determined by the models.

11. (once amended) A system configured to increase efficiency of marketing campaigns, said system comprising:

a customer database which includes customer demographics and historical data;

a targeting engine for analyzing data input and generating data output, said targeting engine having a plurality of models stored thereon, said targeting engine uses said historical data and combines said models to determine a target group for marketing; and

a graphical user interface for accessing customer database and displaying data output.

13. (once amended) A system according to Claim [12] 11 further configured to use historical data <u>stored</u> in said customer database to direct a marketing campaign towards a target group flagged by the plurality of models.

14. (once amended) A system according to Claim 11 further configured to combine <u>a plurality of</u> models to determine a depth of a targeted mailing.

15. (once amended) A system according to Claim 11 further configured to combine <u>a plurality of</u> models to determine a likelihood of a customer response.
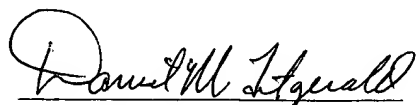
16. (once amended) A system according to Claim 11 further configured to combine <u>a plurality of</u> models to generate a potential customer list.

17. (once amended) A system according to Claim 11 further configured to combine <u>a plurality of</u> models to determine a risk factor for a target group.

18. (once amended) A system according to Claim 11 further configured to combine <u>a plurality of</u> models to determine expected profitability per customer of a marketing campaign.

19. (once amended) A system according to Claim 11 further configured to combine <u>a plurality of</u> models to determine expected profitability per product of a marketing campaign.

Respectfully Submitted,

Daniel M. Fitzgerald
Registration No. 38,880
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070